

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.
)	
SEBASTIAN JAQUE BROWN,)	
)	
Defendant.)	
)	
)	

INDICTMENT

COUNT ONE: [21 U.S.C. §§ 841(a)(1) and (b)(1)(D)]

The Grand Jury charges that:

On or about the 7th day of November 2023, in Tuscaloosa County, within the Northern District of Alabama, the defendant,

SEBASTIAN JAQUE BROWN,

did knowingly and intentionally possess with intent to distribute a controlled substance, such offense involving a mixture and substance containing a detectable amount of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

COUNT TWO: [18 U.S.C. § 924(c)(1)(A)]

The Grand Jury charges that:

On or about the 7th day of November 2023, in Jefferson County, within the Northern District of Alabama, the defendant,

SEBASTIAN JAQUE BROWN,

knowingly used and carried a firearm, that is, a **Glock .45 caliber pistol, a Glock 9mm pistol, a Glock .40 caliber pistol, and a .38 caliber Smith and Wesson pistol**, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the drug trafficking crime alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE: [18 U.S.C. § 922(o)]

The Grand Jury charges that:

On or about the 7th day of November 2023, in Jefferson County, within the Northern District of Alabama, the defendant,

SEBASTIAN JAQUE BROWN,

did knowingly possess a machinegun, that is, a **Glock .45 caliber pistol, and a Glock 9mm caliber pistol**, each with a Glock conversion device installed enabling it to fire automatically more than one shot, without manual reloading, by a single function of

the trigger, commonly referred to as a “Glock Switch,” in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

A TRUE BILL

/s/electronic signature
FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA
United States Attorney

/s/electronic signature
WILLIAM R. MCCOMB
Assistant United States Attorney